

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 5/12/2020
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Taha KHELALFA, Individually and on	:	
behalf of all other persons similarly situated,	:	Civil Action No. 1:19-cv-10727 (MKV)
	:	
Plaintiffs,	:	
	:	
v.	:	STIPULATION AND
GENERAL ELECTRIC COMPANY,	:	CONFIDENTIALITY ORDER
	:	
Defendant.	:	
	:	
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WHEREAS, the above-captioned action filed by Plaintiff Taha Khelalfa (“Plaintiff”) concerns an agreement entered into between Defendant General Electric Company (“GE”), Alstom SA, and the French government, dated November 4, 2014 (the “2014 Agreement”);

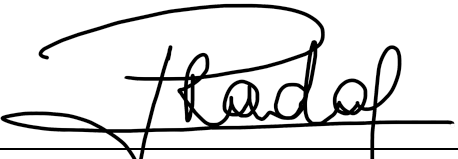
GE and Plaintiff hereby stipulate and agree as follows:

1. The 2014 Agreement and its contents shall be treated as confidential information for purposes of the above-captioned action (the “Action”).
2. The 2014 Agreement, and any copies thereof, shall be used by Plaintiff and his counsel solely for purposes of the Action and for no other purpose. Plaintiff and his counsel shall not disclose, communicate, or share the 2014 Agreement or its contents to or with any person other than counsel of record in this Action, including counsel’s paralegals, secretarial and clerical personnel.
3. The parties agree to file under seal and in redacted form any Court submissions, or portions thereof, containing the 2014 Agreement or its contents, in the manner prescribed by Rule 9(B) of the Court’s Individual Rules of Practice.

4. In the event the Action is dismissed, this Stipulation shall not preclude Plaintiff from seeking a copy of the Agreement in an action before a French court of competent jurisdiction in accordance with the rules of that court.

DATED this May 7, 2020.

By: _____


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Attorneys for Defendant General Electric Company

Dated: 5/12/2020

SO ORDERED:



The Honorable Mary Kay Vyskocil, United States District Judge